

Exhibit I

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ERIN GURSSLIN,

Plaintiff,

-against-

20-cv-6508 (EAW)(MJP)

THE CITY OF ROCHESTER, a municipal
entity, POLICE OFFICER JEREMY NELLIST,
POLICE OFFICER JOSHUA KELLY,
COMMANDER FABIAN RIVERA,
LIEUTENANT AARON SPRINGER,

Defendants.

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO THE CITY OF ROCHESTER

PLEASE TAKE NOTICE that Plaintiff, by and through his attorney, and pursuant to Federal Rule of Civil Procedure 33, requests that THE CITY OF ROCHESTER answer each of the following interrogatories separately and fully in writing and under oath within thirty (30) days after service thereof.

DEFINITIONS

Plaintiff hereby incorporates the Uniform Definitions in Discovery Requests contained in Rule 26.3 of the Local Rules and the Definitions listed in Plaintiff's First Request for Production of Documents to Defendants.

INSTRUCTIONS

Plaintiff hereby incorporates the Instructions contained in Plaintiff's First Request for Production of Documents to Defendants, in addition to the following instructions:

1. In answering the following interrogatories, you shall furnish all information that is available to you, including information in the possession, custody, or control of your attorneys, accountants, investigators, experts, representatives or other agents.

2. If, in answering the following, you are unable to answer fully, after exercising due diligence to obtain the information to do so, you shall answer said interrogatory to the fullest extent possible, specifying your inability to answer the remainder, describing the efforts taken by you to obtain the information to fully answer said interrogatory, and stating whatever information or knowledge you have concerning the unanswered portion thereof.

3. If, in answering the following interrogatories, you state in whole or in part that “I do not know” or “unknown” or otherwise indicate any similar lack of knowledge, you shall state in detail all efforts made to obtain the information requested, the nature of any continuing efforts in that regard, and by whom any such efforts were and are being made.

INTERROGATORIES

1. For every police officer listed on the City’s supplemental rule 26 disclosures and second supplemental rule 26 disclosures, identify by date and criminal report number every incident that each officer will “speak to ... in which dogs have been shot while they were officers at RPD.”

2. For every police officer listed on the City’s supplemental rule 26 disclosures and second supplemental rule 26 disclosures, detail the substance of what each officer will “speak to” regarding each incident identified in response to interrogatory no. 1.

3. For every police officer listed on the City’s supplemental rule 26 disclosures and second supplemental rule 26 disclosures, identify by date and criminal report number every incident where the officer shot a dog.

4. For every police officer listed on the City’s supplemental rule 26 disclosures and second supplemental rule 26 disclosures, identify by date and criminal report number every incident where the officer witnessed another officer shoot a dog.

5. For every police officer listed on the City's supplemental rule 26 disclosures and second supplemental rule 26 disclosures, identify every training attended by each officer regarding interactions with dogs, including but not limited to the Humane Society training provided in 2014 and any subsequent Humane Society training. For each training, state the date on which said officer attended the training, where the training was held, the name of the instructor, and the name of the organization who sponsored and/or developed the training.

Dated: November 7, 2022
New York, New York

ROTH & ROTH LLP

By: ~//s//~
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